U.S. Department of Transportation

United States Coast Guard

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RM 8008

In the Matter of amendment to)
Emergency Position-Indicating)
Radiobeacon (EPIRB) Rules in)
Part 80, Title 47, Code of)
Federal Regulations

PETITION FOR RULE MAKING BY THE UNITED STATES COAST GUARD

The United States Coast Guard (USCG) respectfully petitions the Federal Communications Commission to amend its rules contained in Part 80, Title 47, Code of Federal Regulations, as they pertain to Emergency Position-Indicating Radiobeacons (EPIRBs) for the reasons and manner set forth herein.

The USCG is an agency within the Executive Department of the Federal Government that is responsible for marine safety, and search and rescue (SAR) in the Maritime Region of the United States as described in the National SAR Plan.

In August, 1988, the Commission amended Part 80 of the Rules to permit ships to use 406 MHz Satellite Emergency Position-Indicating Radiobeacons (Satellite EPIRBs) for distress alerting and SAR functions. The National Oceanic and Atmospheric Administration (NOAA) implemented a system of voluntary registration of the EPIRB-unique hexidecimal identification code. This is in accord with an International Maritime Organization (IMO) resolution which requires States to maintain a registration database if they allow serialized beacon coding protocols. United States' beacons predominantly use serialized beacon coding.

SAR authorities' primary need for registration information comes from an understanding that this simple and cost-free mechanism allows them to save lives and property that would otherwise perish. Regulations already require commercial vessels to carry 406 MHz EPIRBs. Manufacturers and government agencies encouraged a voluntary system of registration, but it has not realized the level of participation needed to promote overall safety.

The COSPAS-SARSAT system functions with a constellation of four polar-orbiting satellites that identify and locate active beacons, and notify Rescue Coordination Centers (RCCs) through other communication segments of the system. SAR authorities then dispatch rescue equipment to the beacon location. However, the type of equipment needed to rescue hundreds of passengers aboard a sinking cruise liner is much different than to rescue a six-person crew from a burning fishing boat.

The information requested from mariners in beacon registration allows SAR authorities to know the size and type of vessel involved. Correct resources can be sent to relieve the distress situation, or remove the persons from peril.

406 MHz EPIRB signals can also be relayed to RCCs almost immediately (without waiting for overflight of a polar-orbiting satellite) by way of specially-equipped geostationary satellites. The U.S. provides such a satellite, and Japan and India intend to do so soon. Since geostationary satellite signal reception technology cannot determine EPIRB positions, the potential value of its rapid alerting (dispatch of SAR resources up to five hours sooner) cannot be realized without information derived directly or indirectly from the EPIRB registration data.

EPIRB registration also allows use of communications to resolve false alarms without dispatch of SAR resources. This greatly reduces the risk incurred by search crews, conserves their limited resource for the times when they are really needed, and reduces costs. It costs an average of $4,000 to resolve a maritime false alarm when helicopters must be used to locate the beacon.

Accordingly, the USCG submits this proposed revision to 47 CFR 80.1061 (f); change the sub-paragraph to read,

> "Each 406.025 MHz Satellite EPIRB must be registered with NOAA, and that information kept up-to-date. Vessel owners shall ensure that each 406.025 MHz Satellite EPIRB is properly registered with NOAA before placing the EPIRB into service. (Manufacturers provide registration cards with each EPIRB as noted in paragraph (e)). Vessel owners shall advise NOAA in writing upon change of vessel or EPIRB ownership, transfer of the EPIRB to another vessel, or any other change in registration information. NOAA will provide registrants with proof of registration, and change of registration postcards."

47 CFR 80.1061 (g); change the sub-paragraph designation to (h).

47 CFR 80.1061 (g); Insert new sub-paragraph (g) to read,

"In addition to the identification plate or label requirements contained in sub-sections 2.925, 2.926, and 2.1003 of the Commission's Rules, each 406.025 MHz Satellite EPIRB must be provided on the outside with a clearly discernible permanent plate or label containing the following statement: "This EPIRB must be properly registered with the National Oceanic and Atmospheric Administration (NOAA) whose address is: NOAA, NESDIS, USMCC Data Base Manager, Federal Building 4, Washington, D.C. 20233."

Respectfully submitted,

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